

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

WORKERS UNITED,

*Plaintiff,*

v.

STARBUCKS CORPORATION,

*Defendant.*

---

Civil Action No. 2:23-cv-4036

**JOINT STATUS REPORT**

Plaintiff Workers United and Defendant Starbucks Corporation (“Starbucks”) (collectively, the “Parties”), through their respective undersigned counsel, hereby submit this Joint Status Report in accordance with the Court’s Order (Dkt. No. 36) and state as follows:

1. On October 18, 2023, Plaintiff filed a Complaint against Starbucks in this Court (Dkt. No. 1),<sup>1</sup> and Defendant Starbucks filed a complaint in the Southern District of Iowa. The cases involve the same Parties, Workers United and Starbucks, and related claims and facts. *See Starbucks Corp. v. Workers United*, No. 23-00068 (S.D. Iowa) (the “Iowa Action”).

2. In addition to these two actions, the Parties are involved in several complex non-litigation disputes related to unionization efforts of Starbucks partners.<sup>2</sup>

3. On February 21, 2024, the Parties participated in a full-day mediation session with Mr. David Geronemus, Esq. concerning potential alternative dispute resolution of both this action,

---

<sup>1</sup> Plaintiff subsequently filed a First Amended Complaint on February 12, 2024. Dkt. No. 27.

<sup>2</sup> Starbucks refers to its employees as “partners.”

the Iowa Action, and the other non-litigation disputes between the Parties. That session was productive, and the Parties agreed to engage in further good-faith negotiations.

4. Since the mediation session, the Parties have made additional progress towards resolution of this and other disputes. On February 27, 2024, Starbucks and Workers United announced publicly that they had agreed to begin discussions on a foundational framework to achieve the resolution of litigation between them, including this case, along with other matters.

5. On April 24, 2024, the parties met to resume collective bargaining. Starbucks has committed to a goal of “reaching ratified contracts for represented stores in 2024.” Contract bargaining is “intended to achieve both collective bargaining agreements for represented stores and resolve litigation, including that related to the Starbucks brand.”

6. The Parties have continued to work towards a global resolution of the litigation between them and other non-litigation disputes, but need additional time given the large number and complexity of the issues. The Parties have sought and obtained several stays and extensions in this action and in the Iowa Action to facilitate their good-faith negotiations to reach a global resolution that would include this litigation.

7. The current deadline for Starbucks to answer, move, or otherwise respond to the First Amended Complaint in this action is June 14, 2024.

8. The Iowa Action is currently stayed through July 29, 2024.

9. Given the multiple complex issues in dispute, the Parties believe that their good-faith negotiations will benefit from a further stay of this action and, therefore, are concurrently filing a Joint Stipulation and Proposed Order to Stay.

Respectfully submitted,

**DLA PIPER LLP**

Dated: June 7, 2024

/s/ Daniel M. Rosenthal

Daniel M. Rosenthal (*pro hac vice*)  
Elizabeth Grdina (*pro hac vice*)  
Charlotte H. Schwartz (*pro hac vice*)  
James & Hoffman, P.C.  
1629 K Street NW, Suite 1050  
Washington, DC 20006  
(202) 496-0500  
(202) 496-0555 facsimile  
[dmrosenthal@jamhoff.com](mailto:dmrosenthal@jamhoff.com)  
[bgrdina@jamhoff.com](mailto:bgrdina@jamhoff.com)  
[chschwartz@jamhoff.com](mailto:chschwartz@jamhoff.com)  
Eric L. Young  
Young Law Group  
3031C Walton Road, Suite 301  
Plymouth Meeting, PA 19462  
(215) 367-5151  
[eyoung@young-lawgroup.com](mailto:eyoung@young-lawgroup.com)

Mary Joyce Carlson (*pro hac vice*)  
1629 K Street NW, Suite 1050  
Washington, DC 20006  
(202) 230-4096  
[carlsonmjj@yahoo.com](mailto:carlsonmjj@yahoo.com)

Rebecca Tushnet  
Lex Lumina PLLC  
745 5th Avenue, Suite 500  
New York, NY 10151  
703-593-6759  
[rtushnet@lex-lumina.com](mailto:rtushnet@lex-lumina.com)

*Attorneys for Plaintiff Workers United*

/s/ Ilana H. Eisenstein

Ilana H. Eisenstein  
Marie Bussey-Garza  
PA ID Nos. 94907; 324584  
1650 Market Street  
One Liberty Place, Suite 5000  
Philadelphia, PA 19103  
Tel: (215) 656-3300  
Fax: (215) 656-3301  
[ilana.eisenstein@us.dlapiper.com](mailto:ilana.eisenstein@us.dlapiper.com)  
[marie.bussey-garza@us.dlapiper.com](mailto:marie.bussey-garza@us.dlapiper.com)

Mary E. Gately (*pro hac vice*)  
500 Eighth Street NW  
Washington, DC 20004  
Tel: (202) 799-4507  
Fax: (202) 799-5507  
[mary.gately@us.dlapiper.com](mailto:mary.gately@us.dlapiper.com)

*Attorneys for Defendant Starbucks  
Corporation*

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I caused the foregoing document to be filed with the Clerk of Court using the CM/ECF system, which will automatically notify all counsel of record.

Dated: June 7, 2024

/s/ Ilana H. Eisenstein

Ilana H. Eisenstein